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# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

BILL RANA
ERIC ARMES
JASON EVANS
HASANI JÁMES
CODY BONANNO
PHILLIP BONANNO
DOMINIC QUARTURE
MARK STOCKHAUSEN
PATRICK RIZZO

Criminal No. 26-377

[UNDER SEAL]

(21 U.S.C. § 846; 18 U.S.C. § 922(g)(1))

FILED

DEC 01 2020

<u>INDICTMENT</u>

**COUNT ONE** 

CLERK U.S. DISTRICT COURT WEST. DIST. OF PENNSYLVANIA

The grand jury charges:

From in and around January 2020, and continuing thereafter to in and around November 2020, in the Western District of Pennsylvania and elsewhere, the defendants, BILL RANA, ERIC ARMES, CODY BONANNO, PHILLIP BONANNO and DOMINIC QUARTURE, did knowingly, intentionally, and unlawfully conspire with one another and with persons both known and unknown to the grand jury, to distribute and possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

All in violation of Title 21, United States Code, Section 846.

#### **COUNT TWO**

The grand jury further charges:

From in and around January 2020, and continuing thereafter to in and around November 2020, in the Western District of Pennsylvania and elsewhere, the defendants, BILL RANA, JASON EVANS, HASANI JAMES, PHILLIP BONANNO and MARK STOCKHAUSEN, did knowingly, intentionally, and unlawfully conspire with one another and with persons both known and unknown to the grand jury, to distribute and possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).

All in violation of Title 21, United States Code, Section 846.

### **COUNT THREE**

The grand jury further charges:

On or about October 21, 2020, in the Western District of Pennsylvania, the defendant, PATRICK RIZZO, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, namely, Manufacturing, Delivering, Possession with Intent to Manufacture or Deliver a Controlled Substance, on or about August 5, 1994, at Docket Number CP-02-CR-2473-1994, in the Court of Common Pleas, County of Allegheny, Criminal Division, Commonwealth of Pennsylvania, knowingly possessed, in and affecting interstate commerce, a firearm, to wit: one (1) Black Taurus Judge .45 LC/410, bearing serial number LY499582.

In violation of Title 18, United States Code, Section 922(g)(1).

# **NOTICE OF SPECIAL FINDINGS**

The grand jury further finds:

- 1. As to Counts One and Two, the defendant, BILL RANA:
- (a) was previously convicted on or about January 15, 2009, in the United States District Court for the Western District of Pennsylvania, at Docket Number: 1:08-CR-69, of the crime of conspiracy to distribute and to possess with intent to distribute five (5) kilograms or more of cocaine;
- (b) served a term of imprisonment of more than twelve (12) months for the offense described in Subparagraph 1(a); and
- (c) was released from any term of imprisonment for the offense described in Subparagraph 1(a) within fifteen (15) years of the commencement of each of the offenses charged in Counts One and Two.
  - 2. As to Count Two, the defendant, JASON EVANS:
- (a) was previously convicted on or about January 24, 2007, in the Court of Common Pleas of Erie County, at Docket Number: CP-25-CS-0000231-2007, of the crime of possession with intent to deliver a controlled substance;
- (b) served a term of imprisonment of more than twelve (12) months for the offense described in Subparagraph 2(a); and
- (c) was released from any term of imprisonment for the offense described in Subparagraph 2(a) within fifteen (15) years of the commencement of the offense charged in Count Two.

# FORFEITURE ALLEGATIONS

- 1. The allegations contained in Counts One and Two of this Indictment are incorporated by reference as if fully set forth herein for the purpose of alleging criminal forfeiture pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p), and Title 28, United States Code, Section 2461(c).
- 2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendants, BILL RANA, ERIC ARMES, JASON EVANS, CODY BONANNO, PHILLIP BONANNO, DOMINICK QUARTURE, HASANI JAMES and MARK STOCKHAUSEN, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.
- 3. If any of the property described above, as a result of any act or omission of the defendants:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

3. The allegations contained in Count Three of this Indictment are

incorporated by reference as if fully set forth for the purpose of alleging criminal forfeiture

pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section

2461(c).

4. As part of the commission of the violation of Title 18, United States Code,

Section 922(g)(1) charged in Count Three of this Indictment, the firearm referenced in that count,

that is, one (1) Black Taurus Judge .45 LC/410, bearing serial number LY499582, as well as any

ammunition seized, which was involved and used in the knowing commission of that offense and

which was seized on October 21, 2020, are subject to forfeiture pursuant to Title 18, United States

Code, Section 924(d)(1).

A True Bill,

Foreperson

SCOTT W. BRADY United States Attorney

PA ID No. 88352